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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CLASSIC MARITIME INC., HAIKUO
SHIPPING 1621 LTD., OCEANSURF
OWNERS LTD., and ERWINA SHIPPING,
LTD,

Case No. 1:24-cv-09741-MKV

Plaintiffs,

vs.

GLENCORE SINGAPORE PTE LTD.,

Defendant

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon: (i) the accompanying memorandum of law, and (ii) the Declaration of Peter J. Behmke dated March 28, 2025 (and the exhibits thereto), defendant Glencore Singapore Pte Ltd. (“GSPL”) will move this Court, pursuant to Fed. R. Civ. P. 9(b) and 12(b)(6), to dismiss all claims contained in the First Amended Complaint (ECF No. 18) filed by plaintiffs Classic Maritime Inc., Haikuo Shipping 1621 Ltd., Oceansurf Owners Ltd., and Erwina Shipping, Ltd. GSPL’s motion shall be made before the Honorable Mary Kay Vyskocil, United

States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St,
Courtroom 18C, New York, New York 10007.

Dated: New York, New York
March 28, 2025

Respectfully submitted,

HERBERT SMITH FREEHILLS
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By: /s/ Peter J. Behmke

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